

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BRENNAN M. GILMORE,)	
)	
Plaintiff,)	
)	
v.)	No. 3:18-cv-00017-NKM-JCH
)	
ALEXANDER E. (ALEX) JONES, <i>et al.</i> ,)	
)	
Defendants.)	
)	

JOINT PROPOSED SCHEDULING ORDER

WHEREAS, the Court issued a proposed pretrial order on May 17, 2021; (D.I. 299);

WHEREAS, all parties have conferred and have agreed upon a modified schedule to control the remainder of this action,

WHEREAS, all parties attended a telephonic status conference with the Court on June 25, 2021, whereby the Court ordered an extension of deadlines of 30-45 days to accommodate the search, collection, and production of discovery from Defendants Alexander (“Alex”) Jones and James (“Jim”) Hoft.

All parties hereby submit the proposed scheduling order for deadlines that shall control the remainder of this action:

Event	Current Dates	Proposed Dates
Deadline to complete fact discovery	July 23, 2021	September 6, 2021
Potential settlement / ADR discussion	July 28, 2021	September 10, 2021
Fed. R. Civ. P. 26(a)(2)(B) opening expert reports	July 30, 2021	September 13, 2021
Fed. R. Civ. P. 26(a)(2)(B) responsive expert reports	August 20, 2021	October 4, 2021
Fed. R. Civ. P. 26(a)(2)(B) reply expert reports (limited to subject matter first raised in responsive reports)	September 3, 2021	October 18, 2021
Deadline to complete all discovery, including expert depositions.	September 13, 2021	October 28, 2021
Deadline to file dispositive motions	September 20, 2021	November 4, 2021
Deadline to file oppositions to dispositive motions	October 11, 2021	November 25, 2021
Deadline to file replies to dispositive motions	October 25, 2021	December 9, 2021
Deadline for hearing dispositive motions	TBD by the Court	TBD by the Court
Exchange list of witnesses expected to be called at trial	December 9, 2021	December 9, 2021
Deadline for filing motions <i>in limine</i> (copies to opposing counsel)	December 16, 2021	December 16, 2021
Deadline for filing oppositions to motions <i>in limine</i> (copies to opposing counsel)	January 13, 2022	January 6, 2022
Deadline for filing proposed jury instructions and special interrogatories (copies to opposing counsel)	January 13, 2022	January 13, 2022

Event	Current Dates	Proposed Dates
<p>Deadline for filing joint pretrial order including:</p> <ul style="list-style-type: none"> • any contested issues of law that require a ruling before trial; • the essential elements that a party must prove to establish any meritorious claims remaining for adjudication, and the damages or other relief sought; • the essential elements that a party must prove to establish any meritorious defenses; • the material facts and theories of liability or defense; • the issues of fact contested by each party; • any contested issues of law that do not require a ruling before trial; • any stipulations; and • any special voir dire questions <p>**Disputed sections to be filed as separate addendum**</p>	January 13, 2022	January 13, 2022
Pretrial conference	TBD by the Court	TBD by the Court
Trial	January 18-21 and 24-27, 2022	January 18-21 and 24-27, 2022

Dated: June 25, 2021

Respectfully submitted,

By: /s/ Anwar L. Graves
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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of June, 2021, a copy of the foregoing Joint Proposed Scheduling Order was served on all parties via the Court's Electronic Case Filing (ECF) system, and separately sent via first-class mail to Mr. Lee Stranahan, Derrick Wilburn, and R. Scott Creighton.